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November 10, 2020

VIA CM/ECF

Re: Defendants' Pre-Trial Motions

Dear Judge Vyskocil:

Pursuant to this Court's Order dated July 1, 2020 [ECF-241], Defendants SETH FISHMAN, CHRIS OAKES, JORGE NAVARRO, LISA GIANNELLI, ERICA GARCIA, MARCOS ZULUETA, and MICHAEL TANUZZO ("Defendants") submit this list of pre-trial Motions that Defendants intend to file in this case:

1. Motion to Dismiss Counts 1-2 in the Indictment
2. Motion for a Bill of Particulars
3. Motion for a Severance of Defendants
4. Motion to Suppress Title III Interceptions
5. Motion to Suppress Post-Arrest Statements.
6. Motion to Exclude Experts and/or Expert Testimony
7. Motion to Exclude Prejudicial Surplusage in the Indictment
8. Motion to Compel *Brady* Information
9. Motion to Exclude Introduction of Test Results
10. Motion to Exclude 404(b) Evidence
11. Motion to Exclude Evidence Derived from the Search and/or Seizure of Electronic Devices
12. Motion to Suppress Evidence Derived from Searches of Property

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13. Motion to Exclude Physical Evidence Derived from Search and/or Seizure Warrants
14. Motion to Exclude References to Horse Deaths or Horse Injuries at Trial
15. Motion for Production of Lab Samples for Testing
16. Motion for Production of an Exhibit List, 3500 Material, and *Giglio* Material 90 Days in Advance of Trial
17. Miscellaneous Motions *in Limine* [in advance of trial after a pre-trial order is issued].

This is a non-exhaustive list and Defendants reserve the right to amend or supplement this list of pre-trial motions especially given the breadth of discovery that we anticipate from the recent productions beginning September 29, 2020.

Respectfully submitted,



Andrew S. Feldman, Esq.

cc:

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Sarah Mortazavi, Esq.

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